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VIA E-MAIL AND FAX

TO: Dick Daniel
CALFED Ecosystem Restoration Program

FROM: Kati Buehler
Regulatory Affairs Director, Western Crop Protection Association

RE: Draft Strategic Plan for Ecosystem Restoration

DATE: September 24, 1998

The Western Crop Protection Association (WCPA) is a non profit trade association representing manufacturers, formulators, distributors and retailers of crop protection products and services in 10 western states. We have reviewed the preliminary Draft Strategic Plan for Ecosystem Restoration document and would like to share several comments regarding the document, specifically Goal #6, pp. 89 90.

I have been actively involved as a stakeholder in the last two years with the Water Quality Technical Group (WQTG), and am concerned that there does not appear to have been adequate discussion and coordination between the Ecosystem Restoration and WQTG staff when this document was developed. The Strategic Plan contains proposals that impact existing regulatory programs and processes involving pesticides, yet affected stakeholders who have participated in the WQTG have not been a part of developing this document. We recommend that additional discussion occur before this document is finalized.

The first paragraph describing the objectives within goal #6 states that the Water Quality Program (WQP) is focused on improving water quality for human health, implying the WQP is not addressing ecosystem health concerns. However, the WQP has specifically referenced a number of pesticides in its "Stage 1 expectations" that do not pose any human health issue concerns but rather concerns with sensitive indicator species. I believe the goals of the WQP are already compatible with those needed for improving ecosystem health. Once again, we strongly urge more dialogue between the two groups in order to arrive at a common set of goals.

WCPA and its members are committed to the environmentally sound use of crop protection products and services, and believe this is the most effective approach to reducing risk from pesticides. The WQP recognizes the importance of promoting

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programs that minimize or eliminate water quality problems related to pesticides through proper use within an Integrated Pest Management approach and advocates providing incentives for the development of appropriate management practices to avoid offsite movement. It is generally recognized that reduced use of pesticides is not equivalent to reducing risk.

We appreciate the opportunity to comment and would be pleased to provide additional input prior to the document being finalized.

Cc: Lester Snow, CALFED Bay-Delta Program
Jim Wells, Department of Pesticide Regulation
Steve Shaffer, Department of Food and Agriculture
Kathy Mannion, Western Growers
Bill Thomas, California Grape and Tree Fruit League
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